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perm (tye) } We should not  
} duplicate  
their action

Karen

4/23

4-20-82

Lynn -

The following questions, to be answered by PMTS/WMBR, were raised at the 4-19-82 in-house mtg. on Litton ACD:

1. Will closure have to be completed when the emergency permit expires?
2. Does WMBR want to pursue violation of the closure plan submittal timeframe (6mos.)?
3. Groundwater monitoring during closure.

I have attached my notes of the meeting. In summary, we need to review the revised closure plan when rec'd. (due 4-15) & answer the above questions.

Thanks  
KAF

~~Falk Cht closure~~



R00337303

RCRA RECORDS CENTER

Summary of 4-19-82 Mtg. on Litton ACD -  
Springfield, Mo. MOD007152903

An in-house meeting was held on 4-19-82  
to discuss Litton ACD, Springfield, Mo.

Attendees:

Dave Doyle, AWCM

Dan Shiel, LEGL/CNSL

Debbie McKinley, SPFD, WMBR

Karen Flournoy, PMTS, WMBR

Dave started the meeting by stating  
that AWCM had sent a referral to CNSL  
to issue an Administrative Order for  
non compliance with groundwater monitoring  
requirements (this was based on info.  
received from MDNR and a 3007 letter  
issued in March 82). Litton built up the  
lagoon dikes, the dikes began leaking and  
an emergency permit was issued. Dave  
and Dan discussed 3013 vs. 3008.

Based on the emergency permit  
analytical data, the wastewater may be  
non-hazardous. Karen indicated that they  
had ask for analytical data on the sludge  
in the closure plan review letter. The  
revised closure plan for closing <sup>the</sup> lagoon  
in <sup>the</sup> very near future was due on April 15  
according to the emergency permit.

## Notes from mtg. on Litton ACD continued

Debbie felt that they needed groundwater monitoring data. Their main concern is groundwater contamination. Dave brought up the point that if the lagoon is closed in the next 1-2 months that they could not get a groundwater monitoring system going & would be of no use after the lagoon is closed.

Debbie indicated that the Ozark National Underground Laboratory had done a study for MDNR which indicated that Fantastic Caverns ground water was contaminated & that the contamination could be coming from Litton - studies tracing groundwater movement from Fullbright landfill to Fantastic Caverns have not been completed. They would need an assurance that the contaminated soil is removed at closure.

Karen will check on when the emergency permit expires will closure have to be completed?

Dan ask what everyone wanted him to do. Dave wants: 1. penalties assessed for noncompliance with groundwater monitoring requirements. 2. penalties assessed for increasing design capacity without justification to EPA. 3. leaking dikes - he needs the state

(3)

inspection report.

Karen will check on:

1. How WMBR wants to pursue violation of closure plan submittal timeframe?
2. Status & content of revised closure plan.
3. groundwater monitoring during closure.

Dave will continue to work with Dan & Karen will get back with them after the revised closure plan has been submitted and reviewed.

*Karen Flournoy*  
4-20-82

copy to Lynn Harrington on 4-20-82